

Hearing Date: May 18, 2022, 10:00 a.m.

Opposition Date: April 12, 2022

Reply Date: May 12, 2022

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR  
PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard  
L. Madoff,

Plaintiff,

v.

THE SUMITOMO TRUST AND  
BANKING CO., LTD,

Defendant.

Adv. Pro. No. 11-02573 (CGM)

**DECLARATION OF TARA Q. HIGGINS IN SUPPORT OF DEFENDANT'S  
MOTION TO DISMISS THE TRUSTEE'S AMENDED COMPLAINT**

I, TARA Q. HIGGINS, hereby declare under penalty of perjury as  
follows:

1. I am an associate at the firm Becker, Glynn, Muffly, Chassin & Hosinski LLP, attorneys for the defendant, The Sumitomo Trust and Banking Co., Ltd (“Sumitomo”). I respectfully submit this Declaration in support of Sumitomo’s motion to dismiss the amended complaint filed by plaintiff Irving H. Picard, Trustee (the “Trustee”) for the Liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) in this adversary proceeding:

2. Attached hereto as **Exhibit 1** is a true and correct copy of the amended complaint filed in the above-captioned adversary proceeding, without exhibits.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Exhibit C to the amended complaint filed in the above-captioned adversary proceeding.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Exhibit D to the amended complaint filed in the above-captioned adversary proceeding.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the first amended complaint filed by the Trustee in the matter captioned *Picard v. Fairfield Sentry Ltd., et al.*, Adv. Pro. 09-01239 (Bankr. S.D.N.Y.) (the “Fairfield Action”), Docket. No. 23, without exhibits.

6. Attached hereto as **Exhibit 5** are true and correct copies of Exhibits 8, 10, 12, 13, 14 and 21 to the second amended complaint filed in the Fairfield Action, Docket. Nos. 286-8, 286-10, 286-12, 286-13, 286-14, 286-21.

7. Attached hereto as **Exhibit 6** are true and correct copies of Exhibits 5 and 6 to the second amended complaint filed in the Fairfield Action, Docket. Nos. 286-5, 286-6.

8. Attached hereto as **Exhibit 7** are true and correct copies of the following documents:

7(a)	Excerpts from the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Citibank N.A. et al.</i> , Adv. Pro. No. 10-05345 (Bankr. S.D.N.Y.), Docket No. 1-1, page 52
7(b)	Excerpts from the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Merrill Lynch International</i> , Adv. Pro. No. 10-05346 (Bankr. S.D.N.Y.), Docket No. 1-1, page 43
7(c)	Exhibit D to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Nomura International PLC</i> , Adv. Pro. No. 10-05348 (Bankr. S.D.N.Y.), Docket No. 42-4
7(d)	Excerpts from the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco Bilbao Vizcaya Argentaria, S.A.</i> , Adv. Pro. No. 10-05351 (Bankr. S.D.N.Y.), Docket No. 1-1, page 44
7(e)	Excerpts from the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Pictet et Cie</i> , Adv. Pro. No. 11-01724 (Bankr. S.D.N.Y.), Docket No. 1, page 24
7(f)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Safra National Bank of New York</i> , Adv. Pro. No. 11-01885 (Bankr. S.D.N.Y.), Docket No. 1-3
7(g)	Exhibit K to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque SYZ &amp; Co., S.A.</i> , Adv. Pro. No. 11-02149 (Bankr. S.D.N.Y.), Docket No. 1-11
7(h)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Abu Dhabi Investment Authority</i> , Adv. Pro. No. 11-02493 (Bankr. S.D.N.Y.), Docket No. 1-5

7(i)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Orbita Capital Return Strategy Limited</i> , Adv. Pro. No. 11-02537 (Bankr. S.D.N.Y.), Docket No. 1-3
7(j)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Quilvest Finance Ltd.</i> , Adv. Pro. No. 11-02538 (Bankr. S.D.N.Y.), Docket No. 1-4
7(k)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Meritz Fire &amp; Marine Insurance Co. Ltd.</i> , Adv. Pro. No. 11-02539 (Bankr. S.D.N.Y.), Docket No. 1-3
7(l)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lion Global Investors Limited</i> , Adv. Pro. No. 11-02540 (Bankr. S.D.N.Y.), Docket No. 1-4
7(m)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. First Gulf Bank</i> , Adv. Pro. No. 11-02541 (Bankr. S.D.N.Y.), Docket No. 1-4
7(n)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Parson Finance Panama S.A.</i> , Adv. Pro. No. 11-02542 (Bankr. S.D.N.Y.), Docket No. 1-3
7(o)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Delta National Bank and Trust Company</i> , Adv. Pro. No. 11-02551 (Bankr. S.D.N.Y.), Docket No. 1-4
7(p)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Unifortune Asset Management SGR SPA et ano.</i> , Adv. Pro. No. 11-02553 (Bankr. S.D.N.Y.), Docket No. 1-3
7(q)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. National Bank of Kuwait S.A.K.</i> , Adv. Pro. No. 11-02554 (Bankr. S.D.N.Y.), Docket No. 1-4
7(r)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Cathay Life Insurance Co. LTD</i> , Adv. Pro. No. 11-02568 (Bankr. S.D.N.Y.), Docket No. 1-4
7(s)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Cathay Life Insurance Co. LTD</i> , Adv. Pro. No. 11-02568 (Bankr. S.D.N.Y.), Docket No. 1-5

7(t)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barclays Bank (Suisse) S.A. et al.</i> , Adv. Pro. No. 11-02569 (Bankr. S.D.N.Y.), Docket No. 1-4
7(u)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barclays Bank (Suisse) S.A. et al.</i> , Adv. Pro. No. 11-02569 (Bankr. S.D.N.Y.), Docket No. 1-7
7(v)	Exhibit I to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barclays Bank (Suisse) S.A. et al.</i> , Adv. Pro. No. 11-02569 (Bankr. S.D.N.Y.), Docket No. 1-9
7(w)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banca Carige S.P.A.</i> , Adv. Pro. No. 11-02570 (Bankr. S.D.N.Y.), Docket No. 1-3
7(x)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Privee Espirito Santo S.A. formerly known as Compagnie Bancaire Espirito Santo S.A.</i> , Adv. Pro. No. 11-02571 (Bankr. S.D.N.Y.), Docket No. 1-4
7(y)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Korea Exchange Bank, Individually and as Trustee for Korea Global All Asset Trust I-1, and for Tams Rainbow Trust III</i> , Adv. Pro. No. 11-02572 (Bankr. S.D.N.Y.), Docket No. 1-3
7(z)	Exhibit D to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. The Sumitomo Trust and Banking Co., Ltd.</i> , Adv. Pro. No. 11-02573 (Bankr. S.D.N.Y.), Docket No. 8-4
7(aa)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ASB Bank Corp.</i> , Adv. Pro. No. 11-02730 (Bankr. S.D.N.Y.), Docket No. 1-4
7(bb)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Trincaster Corporation</i> , Adv. Pro. No. 11-02731 (Bankr. S.D.N.Y.), Docket No. 1-3
7(cc)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bureau of Labor Insurance</i> , Adv. Pro. No. 11-02732 (Bankr. S.D.N.Y.), Docket No. 1-3

7(dd)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Naidot &amp; Co.</i> , Adv. Pro. No. 11-02733 (Bankr. S.D.N.Y.), Docket No. 1-3
7(ee)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Caceis Bank, Caceis Bank Luxembourg</i> , Adv. Pro. No. 11-02758 (Bankr. S.D.N.Y.), Docket No. 1-4
7(ff)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ABN AMRO Bank N.V. (now known as The Royal Bank of Scotland, N.V.)</i> , Adv. Pro. No. 11-02760 (Bankr. S.D.N.Y.), Docket No. 1-3
7(gg)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lighthouse Investment Partners LLC, doing business as Lighthouse Partners</i> , Adv. Pro. No. 11-02762 (Bankr. S.D.N.Y.), Docket No. 1-4
7(hh)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lighthouse Investment Partners LLC, doing business as Lighthouse Partners</i> , Adv. Pro. No. 11-02762 (Bankr. S.D.N.Y.), Docket No. 1-5
7(ii)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Inteligo Bank LTD. Panama Branch, formerly known as Blubank LTD. Panama Branch</i> , Adv. Pro. No. 11-02763 (Bankr. S.D.N.Y.), Docket No. 1-4
7(jj)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Somers Dublin Limited et al.</i> , Adv. Pro. No. 11-02784 (Bankr. S.D.N.Y.), Docket No. 1-3
7(kk)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Merrill Lynch Bank (Suisse) SA</i> , Adv. Pro. No. 11-02910 (Bankr. S.D.N.Y.), Docket No. 1-3
7(ll)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Julius Baer &amp; Co. Ltd.</i> , Adv. Pro. No. 11-02922 (Bankr. S.D.N.Y.), Docket No. 1-3

7(mm)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Falcon Private Bank Ltd. (formerly known as AIG Privat Bank AG)</i> , Adv. Pro. No. 11-02923 (Bankr. S.D.N.Y.), Docket No. 1-3
7(nn)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Suisse AG et al.</i> , Adv. Pro. No. 11-02925 (Bankr. S.D.N.Y.), Docket No. 1-5
7(oo)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. LGT Bank in Liechtenstein Ltd.</i> , Adv. Pro. No. 11-02929 (Bankr. S.D.N.Y.), Docket No. 1-3
7(pp)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. The Public Institution for Social Security.</i> , Adv. Pro. No. 12-01002 (Bankr. S.D.N.Y.), Docket No. 1-3
7(qq)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Fullerton Capital PTE Ltd.</i> , Adv. Pro. No. 12-01004 (Bankr. S.D.N.Y.), Docket No. 1-3
7(rr)	Exhibit F to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. SICO Limited</i> , Adv. Pro. No. 12-01005 (Bankr. S.D.N.Y.), Docket No. 14-6
7(ss)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco Itau Europa Luxembourg S.A. et ano.</i> , Adv. Pro. No. 12-01019 (Bankr. S.D.N.Y.), Docket No. 1-6
7(tt)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco Itau Europa Luxembourg S.A. et ano.</i> , Adv. Pro. No. 12-01019 (Bankr. S.D.N.Y.), Docket No. 1-7
7(uu)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Grosvenor Investment Management Ltd. et al.</i> , Adv. Pro. No. 12-01021 (Bankr. S.D.N.Y.), Docket No. 1-3
7(vv)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Grosvenor Investment Management Ltd. et al.</i> , Adv. Pro. No. 12-01021 (Bankr. S.D.N.Y.), Docket No. 1-4

7(ww)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Grosvenor Investment Management Ltd. et al.</i> , Adv. Pro. No. 12-01021 (Bankr. S.D.N.Y.), Docket No. 1-5
7(xx)	Exhibit J to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Agricole (Suisse) S.A. et al.</i> , Adv. Pro. No. 12-01022 (Bankr. S.D.N.Y.), Docket No. 1-10
7(yy)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Arden Asset Management Inc. et al.</i> , Adv. Pro. No. 12-01023 (Bankr. S.D.N.Y.), Docket No. 1-3
7(zz)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. SNS Bank N.V. et ano.</i> , Adv. Pro. No. 12-01046 (Bankr. S.D.N.Y.), Docket No. 1-3
7(aaa)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Koch Industries, Inc., as successor in interest to Koch Investment (UK) Company</i> , Adv. Pro. No. 12-01047 (Bankr. S.D.N.Y.), Docket No. 1-3
7(bbb)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco General S.A. et ano.</i> , Adv. Pro. No. 12-01048 (Bankr. S.D.N.Y.), Docket No. 1-3
7(ccc)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Kookmin Bank</i> , Adv. Pro. No. 12-01194 (Bankr. S.D.N.Y.), Docket No. 1-3
7(ddd)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Six Sis AG</i> , Adv. Pro. No. 12-01195 (Bankr. S.D.N.Y.), Docket No. 1-3
7(eee)	Exhibit I to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Vontobel AG formerly known as Bank J. Vontobel &amp; Co. AG</i> , Adv. Pro. No. 12-01202 (Bankr. S.D.N.Y.), Docket No. 1-9
7(fff)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Multi-Strategy Fund Limited et ano.</i> , Adv. Pro. No. 12-01205 (Bankr. S.D.N.Y.), Docket No. 1-6



7(ggg)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lloyds TSB Bank PLC</i> , Adv. Pro. No. 12-01207 (Bankr. S.D.N.Y.), Docket No. 1-3
7(hhh)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BSI AG, individually and as successor in interest to Banco Del Gottardo</i> , Adv. Pro. No. 12-01209 (Bankr. S.D.N.Y.), Docket No. 1-3
7(iii)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BSI AG, individually and as successor in interest to Banco Del Gottardo</i> , Adv. Pro. No. 12-01209 (Bankr. S.D.N.Y.), Docket No. 1-4
7(jjj)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Schroder &amp; Co. Bank AG</i> , Adv. Pro. No. 12-01210 (Bankr. S.D.N.Y.), Docket No. 1-14
7(kkk)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Union Securities Investment Trust Co., Ltd. et al.</i> , Adv. Pro. No. 12-01211 (Bankr. S.D.N.Y.), Docket No. 1-3
7(lll)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Union Securities Investment Trust Co., Ltd. et al.</i> , Adv. Pro. No. 12-01211 (Bankr. S.D.N.Y.), Docket No. 1-4
7(mmm)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Union Securities Investment Trust Co., Ltd. et al.</i> , Adv. Pro. No. 12-01211 (Bankr. S.D.N.Y.), Docket No. 1-5
7(nnn)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Hapoalim (Switzerland) Ltd. et al.</i> , Adv. Pro. No. 12-01216 (Bankr. S.D.N.Y.), Docket No. 1-6
7(ooo)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Hapoalim (Switzerland) Ltd. et al.</i> , Adv. Pro. No. 12-01216 (Bankr. S.D.N.Y.), Docket No. 1-7
7(ppp)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ZCM Asset Holding Company (Bermuda) LLC</i> , Adv. Pro. No. 12-01512 (Bankr. S.D.N.Y.), Docket No. 1-6

7(qqq)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Citivic Nominees Ltd.</i> , Adv. Pro. No. 12-01513 (Bankr. S.D.N.Y.), Docket No. 1-3
7(rrr)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Standard Chartered Defendants</i> , Adv. Pro. No. 12-01565 (Bankr. S.D.N.Y.), Docket No. 1-6
7(sss)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. UKFP (Asia) Nominees Limited</i> , Adv. Pro. No. 12-01566 (Bankr. S.D.N.Y.), Docket No. 1-2
7(ttt)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas S.A.</i> , Adv. Pro. No. 12-01576 (Bankr. S.D.N.Y.), Docket No. 1-3
7(uuu)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. UBS Deutschland AG as successor in interest to Dresdner Bank LateinAmerika AG et ano.</i> , Adv. Pro. No. 12-01577 (Bankr. S.D.N.Y.), Docket No. 1-3
7(vvv)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. UBS Deutschland AG as successor in interest to Dresdner Bank LateinAmerika AG et ano.</i> , Adv. Pro. No. 12-01577 (Bankr. S.D.N.Y.), Docket No. 1-4
7(www)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barfield Nominees Limited</i> , Adv. Pro. No. 12-01669 (Bankr. S.D.N.Y.), Docket No. 1-9
7(xxx)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Agricole Corporate and Investment Bank doing business as Credit Agricole Private Banking Miami, formerly known as Calyon S.A. doing business as Credit Agricole Miami Private Bank, Successor in Interest to Credit Lyonnais S.A.</i> , Adv. Pro. No. 12-01670 (Bankr. S.D.N.Y.), Docket No. 1-9
7(yyy)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Agricole Corporate and Investment Bank doing business as Credit Agricole Private Banking Miami, formerly known as Calyon S.A. doing business as Credit Agricole Miami Private Bank, Successor in Interest to Credit Lyonnais S.A.</i> , Adv. Pro. No. 12-01670 (Bankr. S.D.N.Y.), Docket No. 1-10

7(zzz)	Exhibit E to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Suisse AG, as successor in interest to Clariden Leu AG and Bank Leu AG</i> , Adv. Pro. No. 12-01676 (Bankr. S.D.N.Y.), Docket No. 12-5
7(aaaa)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Societe Generale Private Banking (Suisse) S.A. formerly known as SG Private Banking Suisse S.A. et al.</i> , Adv. Pro. No. 12-01677 (Bankr. S.D.N.Y.), Docket No. 1-5
7(bbbb)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Intesa Sanpaolo SpA (as Successor in Interest to Banca Intesa SpA) et al.</i> , Adv. Pro. No. 12-01680 (Bankr. S.D.N.Y.), Docket No. 1-3
7(cccc)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Intesa Sanpaolo SpA (as Successor in Interest to Banca Intesa SpA) et al.</i> , Adv. Pro. No. 12-01680 (Bankr. S.D.N.Y.), Docket No. 1-4
7(dddd)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. EFG Bank S.A., formerly known as EFG Private Bank S.A. et al.</i> , Adv. Pro. No. 12-01690 (Bankr. S.D.N.Y.), Docket No. 1-7
7(eeee)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Degroof SA/NV also known as Banque Degroof Bruxelles et al.</i> , Adv. Pro. No. 12-01691 (Bankr. S.D.N.Y.), Docket No. 1-3
7(ffff)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Degroof SA/NV also known as Banque Degroof Bruxelles et al.</i> , Adv. Pro. No. 12-01691 (Bankr. S.D.N.Y.), Docket No. 1-4
7(gggg)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Lombard Odier &amp; Cie SA</i> , Adv. Pro. No. 12-01693 (Bankr. S.D.N.Y.), Docket No. 1-3
7(hhhh)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Cantonale Vaudoise</i> , Adv. Pro. No. 12-01694 (Bankr. S.D.N.Y.), Docket No. 1-3
7(iiii)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bordier &amp; Cie</i> , Adv. Pro. No. 12-01695 (Bankr. S.D.N.Y.), Docket No. 1-3

7(jjjj)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ABN AMRO Fund Services (Isle of Man) Nominees Limited, formerly known as Fortis (Isle Of Man) Nominees Limited et al.</i> , Adv. Pro. No. 12-01697 (Bankr. S.D.N.Y.), Docket No. 1-3
7(kkkk)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Internationale a Luxembourg S.A. (formerly known as Dexia Banque Internationale a Luxembourg S.A.), individually and as successor in interest to Dexia Nordic Private Bank S.A. et al.</i> , Adv. Pro. No. 12-01698 (Bankr. S.D.N.Y.), Docket No. 1-5
7(llll)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Royal Bank of Canada et al.</i> , Adv. Pro. No. 12-01699 (Bankr. S.D.N.Y.), Docket No. 1-5

9. Attached hereto as **Exhibit 8** is a true and correct copy of the brief filed by the Trustee, as appellant, in *In re Bernard L. Madoff Inv. Sec. LLC*, No. 12-2557 (2d Cir. May 15, 2013), ECF 145.

10. Attached hereto as **Exhibit 9** is a true and correct copy of the “Trustee’s Proffered Allegations Pertaining to the Extraterritoriality Issue as to the CDP Defendants” filed in *Picard v. Multi-Strategy Fund Limited*, Adv. Pro. No. 12-01205, (Bankr. S.D.N.Y.), Docket No. 57.

11. Attached hereto as **Exhibit 10** is a true and correct copy of the Settlement Agreement dated as of May 9, 2011, between the Trustee and Kenneth Krys and Joanna Lau, as Joint Liquidators of Fairfield Sentry Limited (“Sentry”), Fairfield Sigma Limited (“Sigma”), and Fairfield Lambda Limited (“Lambda”), filed in the Fairfield Action, Docket. No. 69-2, with exhibits thereto.

12. Attached hereto as **Exhibit 11** is a true and correct copy of Sentry’s Articles of Association.

13. Attached hereto as **Exhibit 12** is a true and correct copy of the complaint filed by the Trustee in *Picard v. Shapiro*, Adv. Pro. No. 10-05383, (Bankr. S.D.N.Y.), Docket No. 33, without exhibits.

14. Set forth below is a chart calculating the sum total of amounts claimed by the Trustee as subsequent transfers from Sentry after May 9, 2003, in the complaints and/or exhibits thereto set forth at **Exhibit 7** hereto:

ADV. PROC.	DEFENDANT(S)	AMOUNT
10-05345	Citibank, N.A., et al	(\$130,000,000)
10-05346	Merrill Lynch International	(\$14,200,000)
10-05348	Nomura International PLC	(\$20,013,186)
10-05351	Banco Bilbao Vizcaya Argentaria, S.A.	(\$45,000,000)
11-01724	Pictet et Cie.	(\$50,386,685)
11-01885	Safra New York	(\$95,853,574)
11-02149	Banque Syz & Co., SA	(\$15,449,241)
11-02493	Abu Dhabi Investment Authority	(\$300,000,000)
11-02537	Orbita	(\$30,662,226)
11-02538	Quilvest Finance Ltd.	(\$37,800,113)
11-02539	Meritz Fire & Insurance Co. Ltd.	(\$21,855,898)
11-02540	Lion Global Investors Limited	(\$50,583,442)
11-02541	First Gulf Bank	(\$11,532,393)
11-02542	Parson Finance Panama S.A.	(\$11,089,081)
11-02551	Delta National Bank and Trust Company	(\$20,634,958)
11-02553	Unifortune Asset Management SGR SpA, et al.	(\$16,355,650)
11-02554	National Bank of Kuwait S.A.K.	(\$18,724,399)
11-02568	Cathay Life Insurance Co. LTD.	(\$24,496,799)
11-02568	Cathay Bank	(\$17,206,126)
11-02569	Barclays Private Bank	(\$893,988)
11-02569	Barclays Spain	(\$4,719,252)
11-02569	Barclays Bank (Suisse) S.A. et al.	(\$37,973,175)
11-02570	Banca Carige S.P.A.	(\$10,532,489)
11-02571	BPES	(\$11,426,745)
11-02572	Korea Exchange Bank	(\$33,593,106)
11-02573	The Sumitomo Trust and Banking Co., Ltd.	(\$54,253,642)
11-02730	Atlantic Security Bank	(\$120,168,691)

ADV. PROC.	DEFENDANT(S)	AMOUNT
11-02731	Trincaster Corporation	(\$13,311,800)
11-02732	Bureau of Labor Insurance	(\$42,123,406)
11-02733	Naidot & Co.	(\$13,654,907)
11-02758	Caceis Bank Luxembourg, et al.	(\$24,052,228)
11-02760	ABN Amro Bank N.V., et al.	(\$2,808,105)
11-02762	Lighthouse Diversified	(\$7,913,873)
11-02762	Lighthouse Supercash	(\$3,251,378)
11-02763	Inteligo Bank LTD.	(\$10,745,160)
11-02784	Somers Dublin Limited et al.	(\$1,985,648)
11-02910	Merrill Lynch Bank (Suisse) SA	(\$44,127,787)
11-02922	Bank Julius Baer & Co. Ltd.	(\$35,258,617)
11-02923	Falcon Private Bank Ltd.	(\$38,675,129)
11-02925	Credit Suisse AG et al.	(\$256,629,647)
11-02929	LGT Bank in Liechtenstein Ltd.	(\$10,350,118)
12-01002	The Public Institution For Social Security	(\$30,000,000)
12-01004	Fullerton Capital PTE Ltd.	(\$10,290,445)
12-01005	SICO LIMITED	(\$14,544,620)
12-01019	Banco Itau Europa Luxembourg S.A., et al.	(\$60,595,069)
12-01019	Banco Itau International	(\$9,969,942)
12-01021	Grosvenor Aggressive	(\$4,191,288)
12-01021	Grosvenor Balanced	(\$13,000,000)
12-01021	Grosvenor Private	(\$14,315,101)
12-01022	Credit Agricole (Suisse) SA	(\$15,654,127)
12-01023	Arden Asset Management, et al.	(\$12,586,659)
12-01046	SNS Bank N.V. et al.	(\$21,060,551)
12-01047	KOCH INDUSTRIES, INC.,	(\$21,533,871)
12-01048	Banco General S.A. et al.	(\$8,240,499)
12-01194	Kookmin Bank	(\$42,010,303)
12-01195	Six Sis AG	(\$379,248)
12-01202	Bank Vontobel AG et. al.	(\$8,470,371)
12-01205	Multi Strategy Fund Ltd., et al.	(\$25,763,374)
12-01207	Lloyds TSB Bank PLC	(\$11,134,574)
12-01209	BSI AG	(\$27,452,138)
12-01209	Banca del Gottardo	(\$20,058,735)
12-01210	Schroder & Co.	(\$25,143,816)
12-01211	Union Securities Investment Trust Co., Ltd., et al.	(\$6,477,447)
12-01211	Union Global Fund	(\$9,283,664)
12-01211	Union Strategy Fund	(\$1,445,016)

ADV. PROC.	DEFENDANT(S)	AMOUNT
12-01216	Bank Hapoalim B.M.	(\$20,047,109)
12-01216	Bank Hapoalim B.M.	(\$1,712,100)
12-01512	ZCM Asset Holding Co (Bermuda) LLC	(\$24,491,791)
12-01513	CITIVIC	(\$59,479,232)
12-01565	Standard Chartered Financial Services (Luxembourg) SA, et al.	(\$275,267,978)
12-01566	UKFP (Asia) Nominees	(\$8,012,183)
12-01576	BNP Paribas S.A. et al	(\$3,423,188)
12-01577	UBS Deutschland AG, et al.	(\$7,230,511)
12-01577	LGT Switzerland	(\$522,826)
12-01669	Barfield Nominees Limited et al	(\$16,178,329)
12-01670	Credit Agricole Corporate and Investment Bank/BBH	(\$26,121,948)
12-01670	Credit Agricole Miami	(\$6,741,013)
12-01676	Clariden Leu AG	(\$35,838,401)
12-01677	Societe General Private Banking (Suisse) SA, et al.	(\$128,678,138)
12-01680	Intesa Sanpaolo SpA-Low Volatility	(\$7,913,079)
12-01680	Intesa Sanpaolo SpA-Medium Volatility	(\$3,740,436)
12-01690	EFG Bank S.A., et al.	(\$201,594,824)
12-01691	Banque Degroof Luxembourg	(\$1,303,203)
12-01691	Banque Degroof	(\$58,473)
12-01693	Banque Lombard Odier & Cie	(\$93,493,502)
12-01694	Banque Cantonale Vaudoise	(\$9,769,927)
12-01695	Bordier & Cie	(\$7,928,454)
12-01697	ABN AMRO Fund Services (Isle of Man) Nominees Limited, et al.	(\$122,001,935)
12-01698	Banque International a Luxembourg SA/Dexia	(\$61,515,524)
12-01699	Royal Bank of Canada, et al.	(\$38,182,649)
	<b>Total Sentry Six-Year Transfers to Investors</b>	<b>(\$3,285,140,273)</b>
	Less Pre-May 9, 2003 transfers	\$74,493,811
	<b>Total Sentry Six-Year Transfers to Investors After First Potentially Avoidable Sentry Initial Transfer (May 9, 2003)</b>	<b>(\$3,210,646,462)</b>

15. Set forth below is a chart calculating the sum total of amounts  
claimed by the Trustee as subsequent transfers from Sentry after May 9, 2003 in

Exhibits 8, 10, 12, 13, 14 and 21 to the second amended complaint in the Fairfield  
Action, attached as **Exhibit 5** hereto:

<b>EXHIBIT NO.</b>	<b>DEFENDANT(S)</b>	<b>AMOUNT</b>
286-8	Fif Advanced Limited	(\$45,206,428)
286-10	Fairfield Investment Fund Limited	(\$337,718,887)
286-12	Fairfield Greenwich Limited	(\$87,440,586)
286-13	Fairfield Greenwich (Bermuda) Limited	(\$611,613,040)
286-14	Fairfield Greenwich Advisors	(\$56,013,598)
286-21	Amit Vijayvergiya	(\$955,465)
	<b>Total Sentry Six-Year Transfers to Investors</b>	<b>(\$1,138,948,004)</b>
	Less Pre-May 9, 2003 transfers	\$103,688,693
	<b>Total Sentry Six-Year Transfers to Investors After First Potentially Avoidable Sentry Initial Transfer (May 9, 2003)</b>	<b>(\$1,035,259,311)</b>

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the  
foregoing is true and correct.

Executed on February 11, 2022  
New York, New York

/s/ Tara Q. Higgins  
Tara Q. Higgins